

Neel Chatterjee (SBN 173985)  
*nchatterjee@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
135 Commonwealth Drive  
Menlo Park, California 94025  
Tel.: +1 650 752 3100  
Fax.: +1 650 853 1038

Brett Schuman (SBN 189247)  
*bschuman@goodwinlaw.com*

Shane Brun (SBN 179079)  
*sbrun@goodwinlaw.com*

Rachel M. Walsh (SBN 250568)  
*rwalsh@goodwinlaw.com*

Hayes P. Hyde (SBN 308031)  
*hhyde@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
Three Embarcadero Center  
San Francisco, California 94111  
Tel.: +1 415 733 6000  
Fax.: +1 415 677 9041

Attorneys for Defendant  
Otto Trucking LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc., et al.,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF NEEL CHATTERJEE  
IN SUPPORT OF DEFENDANT OTTO  
TRUCKING LLC'S OPPOSITION TO  
PLAINTIFF WAYMO LLC'S MOTION  
FOR ORDER TO SHOW CAUSE**

Courtroom: 8, 19<sup>th</sup> Floor  
Judge: Hon. William H. Alsup

1 I, Neel Chatterjee, declare as follows:

2 1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for  
3 Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters  
4 within my own personal knowledge and if called as a witness, I could and would competently  
5 testify to the matters set forth herein. I make this declaration in support of Defendant Otto  
6 Trucking’s Opposition to Plaintiff Waymo LLC’s Motion for Order to Show Cause (the  
7 “Opposition”).

8 2. Attached hereto as Exhibit 1 is a true and correct copy of Otto Trucking LLC’s  
9 Limited Liability Company Agreement, Bates-stamped OTTOTRUCKING00000005–  
10 OTTOTRUCKING00000019.

11 3. Attached hereto as Exhibit 2 is a true and correct copy of the First Amendment to  
12 Limited Liability Company Agreement of Otto Trucking LLC, Bates-stamped  
13 OTTOTRUCKING00000001–OTTOTRUCKING00000003.

14  
15 I declare under penalty of perjury under the laws of the United States that the foregoing is  
16 true and correct. Executed this 5th day of July, 2017 in Menlo Park, California.

17  
18 /s/ Neel Chatterjee  
19 Neel Chatterjee  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on July 5, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 5, 2017

/s/ Neel Chatterjee  
Neel Chatterjee